

Exhibit G

Jessica Kristoffersen

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
JESSICA KRISTOFFERSEN**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF MASSACHUSETTS)
 : SS.:
COUNTY OF PLYMOUTH)

JESSICA KRISTOFFERSEN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 56 Lorna Avenue, Pembroke, Massachusetts 02359.

2. I am currently 32 years old, having been born on July 30, 1989.

3. I am the daughter of John Frank Kristoffersen, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from esophageal cancer on August 25, 2012, at the age of 50. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad's laugh was my favorite sound in the world. It was a regular laugh, but special to me. I began struggling with eating disorders as a teenager. My dad has always been my strongest support system. I have been in and out of treatment centers trying to overcome my disorder. My father fought alongside me to help me get through it. If I was in a treatment facility or hospital, he would always visit. Most importantly, my dad never gave up on me. People don't necessarily understand how difficult it is to overcome an eating disorder. It can be

a life-long struggle. It is difficult to explain the complexity and seriousness to other people. But my dad understood, and I never felt judged by him. When I was healthy enough, my dad and I would go hiking, play cards or just watch TV. I loved spending time with him and knew he loved me for who I was.

6. I was still struggling when my dad was diagnosed with cancer. His support never wavered. He saw me as a whole person. We'd talk a lot about my future. He wanted to teach me to drive so I could get my driver's license. Because I was in and out of treatment, I couldn't always stay in school. Even though I had to stop going to school, my father and I would discuss where I wanted to go to college. That was the topic of discussion when he got sick. He was empowering me to believe in my own future. Neither one of us could have imagined that he wouldn't be a part of it, even after his initial diagnosis. He made a point of finding ways that the rest of my family could be more supportive of me, especially when I was at home.

7. My dad was a homicide detective for the NYPD. When I was younger, I would worry because his job was dangerous. But he was always very confident. He'd go and catch the bad guys and then come home. I was only 11 or 12 years old when the 9/11 attacks happened. I remember being at school and hearing what was happening. I don't think I grasped the magnitude of it. As the events unfolded, I started to get very worried about him. I knew he was working that day, but I didn't know whether it was a morning shift or a night shift. I called him as soon as I got home from school. Thankfully, he wasn't on duty that morning. He was scheduled for the night shift, but by the time I got home from school, he had already left to go to the site.

8. It felt like he was at Ground Zero every day after that. We talked about it a little, mostly about how bad the working conditions were down there. They would eat lunch on site, literally eating toxic debris with his lunch. As a daughter, I hated it. It was so scary to think of him doing that. He was always my hero. The work that he did down there, day after day, made him a superhero.

9. When I found out about my dad's diagnosis, I was at a treatment center in Chicago. My parents came to visit me there. I remember being in the dining hall. They told me my dad was diagnosed with esophageal cancer. This was in September of 2011. My parents assured me that he had the very best care at Sloan Kettering Memorial Cancer Center. My dad

said he was going to be okay. I was scared. I wanted to leave the treatment facility that day to go home with my parents. But I wasn't well enough for that to be an option.

10. I knew my father was getting both chemotherapy and radiation treatments. I was able to be home for a few months during that time. My dad was always a big guy, but he had lost a lot of weight and all of his hair. After the treatments, my dad went in for surgery. The doctors removed the end of his esophagus where the cancer was and then reattached the esophagus to his stomach. The surgery went very well. The doctors told us the margins were clear and he was in remission. But that lasted only a few months before the cancer came back and had spread. He went back to Sloan Kettering. I know they tried some treatments. They did what they could, but ultimately, my father's condition was deemed "terminal."

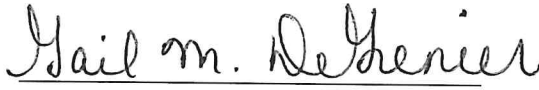
11. My parents weren't ready to give up hope. They went to Mexico for alternative treatment therapy. They didn't want to make it sound like a big deal to me and my brother, but I remember being really angry when they made that decision. I felt like they were wasting his time down there. I was back in Chicago for treatment again when they left. That was probably at the end of July 2012. My father's condition got much worse while he was in Mexico. He came back home. The doctors at Sloan said he needed immediate hospice care. I returned home from Chicago. Our family started hospice at home. At first, my dad was very determined to do things for himself, like walking to the bathroom. But he deteriorated so quickly. He was also starting to get confused. I remember one day he was just looking at me and asked, "Why is this happening to me?" Everything became a struggle. He couldn't eat. We would try to get him to eat just a few bites. He became bedridden days after being home. I would sleep in my mom's bed with her because my dad's hospital bed needed to be on the first floor of the house. We would hear him moaning, sometimes screaming at night. It was awful. On the night of August 24, we called an in-home nurse because we thought he was going to die. He barely made it through the night. We moved him into a hospice facility, where he died later that day.

12. This had a huge impact on me physically and emotionally. I was still struggling with eating disorders and was now in a deep depression. I felt that it should have been me and not him who died. There was definitely survivor's guilt. My family thought his death would make me more determined to recover. But I shut down totally. I didn't see any point in recovery. Medically and emotionally, I was in very bad shape after he died. But I somehow managed to

pull myself out of my illness and recover. The worst part is that he never got to see me as a healthy, happy, successful adult. He'll never know I graduated college. He didn't get to see me achieve all of the things he wanted for me, and more. I have a steady, full-time job as a teacher. He didn't get to see me fall in love, and he'll never meet his grandson, Jackson, who is 3 ½ months old now. It's amazing having a son, and I know my dad would have loved all of it.


JESSICA KRISTOFFERSEN

Sworn to before me this
16th day of June, 2022


Notary Public
Gail M. DeGrenier



GAIL M. DeGRENIER
Notary Public
Commonwealth of Massachusetts
My Commission Expires June 8, 2023

John F. Kristoffersen Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
JOHN F. KRISTOFFERSEN, JR.**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF COLORADO)
 : SS.:
COUNTY OF EL PASO)

JOHN F. KRISTOFFERSEN, JR., being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 5521 Cernan Heights, Apartment 406, Colorado Springs, Colorado 80915.

2. I am currently 30 years old, having been born on October 3, 1991.

3. I am the son of John Frank Kristoffersen, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from esophageal cancer on August 25, 2012, at the age of 50. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad and I had a great relationship. I played a lot of sports, and he always attended all of my games. I was also involved with theater in high school, and my dad was equally as supportive. He came to all of my plays. I don't know if all fathers, especially ones who were police officers, would have been that way. I remember a trip we took to South Carolina, just my dad and me. That was really nice to have that one-on-one time together. We didn't always get a lot of alone time together, just because of family stuff. But my dad made a

point of planning boys' trips, and they always meant a great deal to me. Because he was a NYPD officer, he worked crazy hours. Yet, he made sure to call us every night. I would talk about stuff, and he would give me advice. We would talk about relationships and if I was having any struggles at school. I could talk openly with him, about the stuff teenagers went through.

6. My dad was at the World Trade Center site beginning on September 12th. He remained there for several weeks. He went back and forth between Ground Zero and the Staten Island landfill, where he recovered remains or personal items by sifting through the rubble.

7. I was in college when I found out about my dad's first cancer diagnosis. My parents were visiting me for parent's weekend in the early Fall of 2011. They told me he had esophageal cancer. Before that, my dad was always a pretty healthy guy. He began treatment for the esophageal cancer, and things were going well. He was given a clean bill of health in the beginning of 2012. I was still in college when my dad told me he wasn't feeling well again. He had been vomiting. He was a little nervous and wanted to get it checked out. That's when he found out the cancer had returned and spread to his liver. It was advanced Stage IV.

8. Initially, my dad was being treated at Sloan Kettering Memorial Cancer Center. But, after the cancer spread and got worse, the treatments he was getting at Sloan weren't working. My parents decided to do an experimental treatment in Mexico. I didn't know the details of the treatment he was given down there, but it did nothing to help him, and my parents came home. By this time, my father was obviously very sick and weak. My sister and I would visit him in the hospital. He would try to talk to us, but his voice was very faint.

9. My dad didn't want to die in the hospital, so we brought him home about two weeks before he died. We had a hospital bed set up in the house for him. The family tried to take care of him at home, but eventually, he needed more help than we could provide. We took him to a hospice center. He died that same day.

10. My dad was a big dude with a big personality. Watching him lose that spark and become so dependent on other people to help him, was really tough. My dad was a police officer. It was his job to help other people. Watching that power dynamic shift was heartbreaking.

11. I think about the milestones in my life that my father missed. I graduated from college the year after he died. I got engaged and married, stuff you want your dad to experience with you. It's so much more than him missing big milestones. It's the little things that happen that I don't get to share with him. All the stuff I'm looking forward to in my future that he'll miss, too. I want to have kids. My dad won't get to meet his grandkids. Emotionally, my father's death continues to affect me.

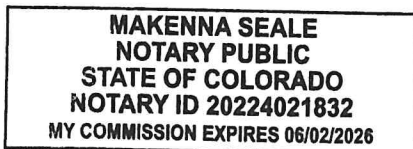
12. Even though it's been ten years since my father passed away, the impact comes in waves. It doesn't get easier. I would say it gets more manageable, because you get used to it with time. But, certain days and certain times of year are always going to be hard. For example, this August marks the ten-year anniversary of his death. My family is having a memorial service for him, which is causing the memories to kick up. The mental impact of losing a parent when you're young is surreal. You don't know when or how it's going to manifest itself. I still find myself in situations, both good and bad, where my mind goes directly to my dad. I wonder what he would do if he were in my shoes. Or if it's something more personal, wishing I could talk to him about it. In those moments, I feel like I have no one to tell those things to. Only someone who has experienced this type of loss can understand.

13. I'm very proud that there was a street renaming on the block where I grew up, Fulton Avenue in Lindenhurst. They named it after my dad. We had a lot of family there, and my dad's old police buddies attended, too. It was nice to be celebrating him instead of mourning him.


JOHN F. KRISTOFFERSEN, JR.

Sworn to before me this
13th day of June, 2022


Makenna Seale
Notary Public



Aimee L. Laks

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al,

Plaintiffs,

**AFFIDAVIT OF
AIMEE L. LAKS**

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)

: SS.:

COUNTY OF PALM BEACH)

AIMEE L. LAKS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 9656 Sills Drive East, #203, Boynton Beach, Florida 33437.

2. I am currently 65 years old, having been born on September 18, 1956.

3. I am the wife of Mitchell David Laks, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Mitchell passed away from esophageal cancer on October 20, 2016, at the age of 62. It was medically determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Mitchell and I knew each other since I was 17 years old, and we were married for over 37 years. We both grew up in Brooklyn. I had gone away to school for three years, and we married when I returned home. Once we had children, we did our best to maintain an active social life. We moved to the New Jersey suburbs and were the first ones in our family to own our own home. We were both healthy and physically fit.

6. Mitch worked for MTA Bridges and Tunnels and did significant physical labor. He worked in maintenance and would have to climb quite a bit. He was quite a strong man. About 11 years ago, before Mitch became sick, we were still very energetic and hands-on. We were raising two boys and were both commuting to work in Manhattan from New Jersey. We were codependent on each other in many respects, like parenting, keeping up the house, mortgage, and pets. We were the prototypical suburban family.

7. Mitch and I traveled extensively over the years, going on cruises and vacations with the children. We enjoyed camping and bought an RV to take weekend road trips. I was always the co-pilot. When Mitch was diagnosed with cancer, he was only a few years from retirement. We had grand plans to make good use of the RV in Mitch's retirement. We hoped to continue camping, watch the birds, and follow the sun. Unfortunately, once Mitch was diagnosed, our plans changed dramatically.

8. On September 11, 2001, I was working in New Jersey, and Mitch was working his regular shifts for the MTA Bridges and Tunnels. The MTA sent Mitch to work in the Brooklyn Battery tunnel, which connected downtown Manhattan to Brooklyn. When the 9/11 attacks occurred, people traveling in both directions in the tunnel left their cars abandoned. Mitchell was assigned to pull the abandoned cars out of the tunnel with his tow truck to make way for emergency vehicles. Mitch told me he was knee-deep in ashes, pulling out cars and

anything else that prevented passage through the tunnel. Mitch continued working for the MTA, conducting maintenance work on the bridges and tunnels, until he retired near the end of 2009.

9. In July 2008, Mitch began to experience significant health issues. During a routine colonoscopy, it was discovered that he had cancer. We were both stunned because, other than a few aches and pains from the physical labor he performed for so many years, Mitch had no complaints and was always a strong and healthy man. He never neglected his care and always went for his regular checkups. The colonoscopy revealed a grapefruit-size mass. Mitch was able to have surgery to remove the mass, and the doctor informed us that it had not metastasized. To prevent any spread, the doctors prescribed chemotherapy and radiation. The chemo was intense and gave him neuropathy in his hands and feet. We connected with a Sloan Kettering satellite facility in New Jersey, so we didn't have to travel into the city for these treatments. Mitch continued to work at the Battery Tunnel, but he was limited to details not involving heavy lifting due to his condition. He worked mainly in the office at the back of the tunnel. This allowed him to get in the last couple of months needed for his retirement. It was a stressful time for us because, in addition to juggling work and chemotherapy treatments, Mitch had to request sick leave in advance because of his chemo. Since his treatment was always on a weekday, he anticipated the need for recovery time following each treatment. Had Mitch not been diagnosed, he likely would have continued work, but he couldn't due to the neuropathy. One of the cruel realities of having neuropathy was that if Mitch touched something, his hands would hurt, especially in cold weather. He could no longer handle working outdoors. The chemo also impacted his fine motor skills, which made it difficult for him to button his shirts because he couldn't feel the tips of his fingers.

10. Following Mitch's colon cancer diagnosis, we moved to Florida in 2010. In 2011, Mitch underwent a biopsy that revealed that he had ureter cancer. It was an extremely stressful time. After each procedure, Mitch would receive another MRI. After sometimes waiting weeks for the results, the doctors would inform us that a new type of cancer was found. Before he passed away, Mitch had been diagnosed with five different cancers, each originating in a separate part of his body.

11. Mitch's successive cancers were painful for him and very impactful for me emotionally. After Mitch was diagnosed with prostate cancer, the doctors reduced his testosterone levels. Once his testosterone levels dropped, Mitch lost interest in sex, and our sex life was over. Mitch would exhibit jealousy and become angry, which took a heavy toll on our relationship. Mitch's cancer impacted our marriage and was particularly stressful for me because I was his primary caregiver for seven years. After losing significant kidney function, Mitch had to use a colostomy bag. In addition to worrying about managing all of my husband's prescriptions, medical appointments, and other points of care, I was suddenly responsible for ensuring the colostomy bag was adequately secured to his stomach so that it wouldn't leak all over the place. After he would run to the bathroom at three in the morning, sometimes the bag would leak. I would need to scrub the floors so it wouldn't leave an odor. My husband was once vibrant and energetic, and suddenly the treatments left him an old man shuffling around in white socks. As his wife, I understood that I would need to accept responsibility for Mitch's care, but I was filled with sadness watching him learn of each illness and make peace with it, only to find that another struggle was right around the corner.


12. It's been five years since Mitch passed away. I am still healing from the wounds left by his suffering and now his absence. When I think about how much my husband suffered, I

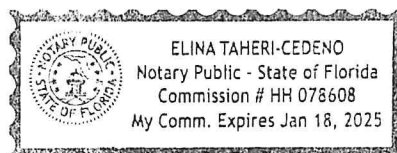
can't help but cry. Mitch was in so much pain that he would scream daily and often misdirected that aggression onto me out of frustration. It had always been my wish that Mitch and I would be together in our retirement and continue to watch as our children grow and develop. However, as his cancer progressed and the effects of the treatments became more severe, Mitch was unable to take care of himself. He became extremely frustrated and would often take it out on me. I was disheartened to discover that our original plan of enjoying retirement together was not meant to be. Eventually, Mitch wanted to live apart and stayed at his sister's house. Although we separated, we never divorced. I'm grateful that I was a reliable caregiver for over seven years despite everything. I am still devastated that my husband's cancer tore our family apart, first attacking our marriage and later creating a rift between one of our children and me.

13. Mitch wasn't just ill. He was battling one cancer after another. I will always be saddened when I think that my husband, a strong, hard-working family man, became someone with a different personality. During Mitch's battle with cancer, I was very depressed and would seek counseling whenever I could, including support groups at our cancer center. While I'm a little stronger than I was at the beginning, it's been five years since Mitch passed away, and I'm still only beginning to heal.


 AIMEE L. LAKS

Sworn to before me this
23 day of May, 2022


 Notary Public



Gail Barbara Laks

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOANNE T. ALCABES, et al,

AFFIDAVIT OF
GAIL BARBARA LAKS

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)
 : SS.:
COUNTY OF PALM BEACH)

GAIL BARBARA LAKS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 70 Burgundy B, Delray Beach, Florida 33484.
2. I am currently 75 years old, having been born on January 22, 1947.
3. I am the sister of Mitchell David Laks, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Mitchell passed away from esophageal cancer on October 20, 2016. It was medically determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Mitchell and I were very close. We lived about one mile away from each other in New Jersey. We both worked, so I would see him on weekends. Every Friday night, we would

get together with all the kids and either go out to dinner or have dinner at Mitchell's house. It became our family tradition. I was also very involved in Mitchell's sons' lives, and we would often go on vacation together when they were on school break. We went to Disney a few times together, as well as beach resorts other times. I became extremely close to my brother and his family because of these shared experiences.

6. At the time of the September 11, 2001 terrorist attacks, Mitchell was working with the Metropolitan Transportation Authority. He was part of the group responsible for going to the Brooklyn-Battery Tunnel and removing the cars that had been stranded there. He then later worked at Ground Zero as part of the cleanup effort in the aftermath of the attacks.

7. In about 2008, Mitchell started not feeling well. After reviewing the results of Mitchell's bloodwork, his primary doctor suggested he have a colonoscopy exam. It was during that exam that they identified a tumor. He underwent surgery as a result of this diagnosis and then later began a course of chemotherapy treatments. These treatments didn't sit well with him, and he had a difficult time getting through them. We thought he was getting better, but he kept developing various other cancers. In the end, he developed five or six cancers, one right after the other. I remember him being diagnosed with colon, prostate, esophageal, bladder, and kidney cancers at different times.

8. It was very difficult for me to see Mitchell in pain and having to undergo operation after operation. He had also moved to Florida by the time of his second cancer diagnosis. This new distance between us made it additionally difficult, as he would tell me he was not feeling well and about the various procedures he had to undergo. I couldn't be there with him. Whenever he would tell me about any tests, I was always nervous about what might come

up. I had to travel all the way to Florida from New Jersey just to be able to see him on weekends every few months.

9. I purchased a condo in Florida so that I could live near Mitchell after retiring, much like how we had lived close to each other in New Jersey when we were growing up. It had not been my intention to move to Florida, but I did so to be close to my brother. Unfortunately, Mitchell passed away before I was able to fully move to Florida, and so we were never able to enjoy our retirements with each other like we had intended. I miss the companionship I would have had with him and the opportunity to travel and enjoy various activities together.

10. I also think about the impact that Mitchell's passing has had on his family, especially his two sons. They would often call their father to talk and for advice, but they do not have this opportunity anymore. Mitchell also has a granddaughter who was very young when he passed away. She did not have the same experience to get to know him as the rest of us did. Mitchell himself is also missing out on the opportunity to see her grow up to be a lovely young lady.

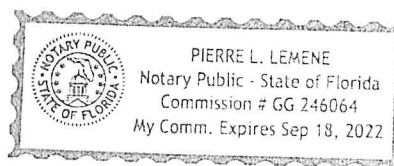
11. I miss my brother deeply. I often think of him when I'm involved in activities that I know he would have enjoyed as well. We had a beautiful connection, and I miss our talks and our Friday night dinners. He and I were the only siblings in our family. We were all we had, and now I have no family connection. It always hurts when I think of that. Mitchell was afraid of dying and fought tooth and nail to get better. I wanted so much to help him survive, but because of the multiple cancers, my hands were tied. There was nothing I could do except reinforce how much I loved him and promise to keep his memory alive with his kids and granddaughter.

12. Mitchell was a wonderful man, and a great father, brother, friend, and soul. His passing is a great loss, and his life was cut way too short.

Gail Barbara Laks
GAIL BARBARA LAKS

Sworn to before me this
1st day of ~~May~~^{JUNE}, 2022

Pierre L. Lemene
Notary Public



Jeannette M. Lamme

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
JEANNETTE M. LAMMÉ**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

JEANNETTE M. LAMMÉ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 668 Broadway, Massapequa, New York 11758.
2. I am currently 43 years old, having been born on February 28, 1979.
3. I am the sister of Lawrence W. Lammé, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Lawrence passed away from metastatic adenocarcinoma on December 7, 2017, at the age of 50. It was determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. For a long time, my older brother Lawrence grew up in the neighboring town from my sisters and me. When Lawrence moved, he remained within twenty minutes driving distance. This really enabled us to have a close relationship. Since my brother was divorced and didn't have children or a family of his own, my sisters and I maintained a strong relationship with him. Later, Lawrence moved down to North Carolina. He drove down there by himself, but we helped pack up the rest of the house for him, and then my sisters and I drove down together to meet him. The most important thing I can say about Lawrence is that anytime any one of us needed something, he was always there for my sisters and me. Like a father, Lawrence always wanted what was best for us. What happened to Lawrence is truly unfair because he was somebody who cherished every moment, loved life, and deserved the chance to live out his life.

6. On September 11, 2001, after learning of the terrorist attacks, Lawrence volunteered to go down to Ground Zero with the sheriff's department. Lawrence's service at Ground Zero continued for several weeks and included work in the police department's search and recovery efforts. I know he would go back and forth to the pit, would complain about being covered in dust, and was always exhausted when he would return.

7. Within a few years of the work Lawrence completed at the World Trade Center, he required treatment for his breathing issues and sought care from a number of pulmonologists. After Lawrence moved down to North Carolina, I was saddened to learn that his health problems had worsened. I recall specifically that, when my sisters and I were helping him with the move, he would complain about his stomach bothering him. In addition, he was visibly short of breath as he moved around. With continuing abdominal pains, my brother went to the hospital in North Carolina several times thinking he may have had a hernia. However, while they didn't see the

cancer at first, further testing and biopsies revealed that he had lung cancer. This must have been sometime around October, 2017.

8. Since there were issues with the level of care he was receiving in North Carolina, Lawrence returned to New York after learning about the cancer diagnosis. We took Lawrence to a hospital in Long Island and then to Memorial Sloan Kettering Cancer Center. At Sloan Kettering, the doctors explained that the cancer spread all over and they were unable to pinpoint exactly where it came from. After being admitted to Sloan, Lawrence started off on chemotherapy right away. Soon afterward, he was given one radiation treatment; however, it weakened him a lot, and he had a bad reaction to the aggressive treatment. Unfortunately, none of the treatments was effective, and Lawrence's condition did not improve. My sister Lauren and I were at the hospital every day. The day after the radiation, the nurses called and said he was not doing well. We continued to stay with our brother, and within a day or two later, Lawrence passed away at Sloan Kettering.

9. Lawrence's passing was devastating to me. He went above and beyond being a brother and was more of a father figure because our dad had not been in our lives for a long time. Even after our father passed away, Lawrence continued to play a supportive role, always taking care of us and offering invaluable advice. As my sisters' families grew, my brother's supportive role extended further, as he became the godfather to each of their sons. He was always there for those two boys, and it hurts me to know that he won't be able to continue to be in their lives and witness all their future accomplishments.

10. One of the most painful experiences I ever had was seeing my brother in the hospital when he would look so scared. I think he must have felt unsure about a lot of things and was frightened of being left alone. My sister Lauren and I tried to be there every day. This

required train rides back and forth to the hospital, as well as time off from work. None of that mattered. We just wanted to reassure Lawrence that we were there for him.

11. During the time my brother was in the hospital, I was working at the Nassau University Medical Center as a registrar in the Emergency and Admitting Department. When he was first in the hospital, I would visit Lawrence during the day and work in the evening. However, after a few days, my sister and I realized that Lawrence's condition changed so quickly we wanted to be more accessible to him. As a result, I took a leave of absence from work for about three weeks. Since I live alone and have to support myself, I generally would work a lot of overtime. When I took a leave of absence, I missed work as well as the overtime pay, which created some temporary hardship. Of course, there are costs for everything when a family member falls ill; although, it pales in comparison to the emotional toll that we incurred.

12. I think about my brother every day. It's extremely unfair considering he was so young, having just turned 50 only two weeks prior to his passing away in the hospital. He was supposed to live out his retirement in his new home in North Carolina, but he never had the chance. Lawrence was somebody who encouraged me a lot and served as a positive force in my life. He was a good person who treated people with respect and tried to help others. My brother left behind two nephews who adored him and would have benefited greatly from his support and encouragement.


JEANNETTE M. LAMMÉ

Sworn to before me this
7 day of May, 2022



Notary Public

Kathline Vasquez
Notary Public, State of New York
Registration No. 01VA6295692
Qualified in Queens County
Commission Expires April 13, 2026

Jennifer Lamme

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
JENNIFER LAMMÉ**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

JENNIFER LAMMÉ, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 23 Yerk Avenue, Ronkonkoma, New York 11779.
2. I am currently 43 years old, having been born on February 28, 1979.
3. I am the sister of Lawrence W. Lammé, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Lawrence passed away from metastatic adenocarcinoma on December 7, 2017, at the age of 50. It was determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My brother Lawrence was very involved with my life. I did not have a great relationship with my mother, so he took me in, and I lived with him for many years. Growing up, he would take my sisters and me to the park, play videogames with us, and was overall a great brother. I am a single mother to my son, and Lawrence helped with childcare while I was at work. They were very close, and Lawrence would take him every day to the park or to play with other kids and his cousin. He was a great role model to my son as well.

6. Lawrence went to Ground Zero with the sheriff's department about a week after the September 11th attacks to assist with search and recovery efforts. He was a volunteer firefighter and originally had wanted to go with the fire department, but they had a full crew so he instead went with the sheriff's department. He wanted to get down there as quickly as possible with whatever group was going.

7. A few years after 9/11, I noticed that Lawrence began having issues with his lungs and breathing. He started seeing pulmonologists and other doctors to try to find the cause of these issues. He saw a doctor at Stony Brook who said that there was something in his lungs. He was moving to North Carolina at the time, so he had a biopsy done after moving there. The doctor in North Carolina that performed this biopsy had said that she was familiar with the ailments affecting those who assisted in the aftermath of the 9/11 attacks. The results of the biopsy were benign, and she suggested that he come back for a follow-up visit after about 6 months. In the interim, Lawrence developed a constant, crippling pain. He thought he had a hernia. The pain was so debilitating that he was unable to pack up his house to complete his move. Nothing he did seemed to alleviate the pain, so he followed up with the doctors in North Carolina.

8. Not long thereafter, Lawrence was unable to walk and had a hard time breathing. I moved down to North Carolina with him in order to help care for him. The four months I spent down there with him were horrible. He was nearly bedridden because of his pain, and when he did walk, he walked hunched over and his back was constantly hurting. He went to the emergency room several times, but the doctors there were unable to tell him what was wrong. He went to a chiropractor, physical therapist, and urgent care because of his symptoms, but none of them conducted any scans or x-rays. They told him that it could be arthritis. I noticed that his coloring was turning noticeably grey, and people were telling him that something might be seriously wrong. He had absolutely no energy to even take my son down to the park, lift things, or walk the dogs. Essentially, he became bedridden and had the appearance of a crippled 80-year-old man.

9. I did not think Lawrence was getting the proper medical care that he needed, and doctors were providing conflicting information. It was all very frustrating for me. Lawrence's breathing difficulties continued to get worse, and one day he thought he was having a heart attack. I took him to a different hospital, about 2 hours away from where we were. I insisted that they admit him to conduct scans and identify the underlying issue of his severe pain and breathing difficulties. It was through these scans that a mass was identified on his hip. After a biopsy, it was determined that Lawrence was suffering from stage 4 lung cancer. By this point, the cancer had already spread from his lungs to his hip and spine. In fact, his spine was fractured which was causing his severe pain and preventing him from walking.

10. This was a very difficult time for me in my life. I was taking care of Lawrence and assisting with his medical care as much and as best I could, but I still had other

responsibilities in my life. I had to care for the house, the dogs, and, especially, my son. I spent several hours each day driving just to manage these various responsibilities.

11. Lawrence believed that he would get better medical care in New York with doctors who were familiar with the ailments of those who helped in the aftermath of the September 11th attacks. I helped him get on a plane and fly up to New York so he could go to a hospital there. I had to help wheel him through the airport, as by this point he was unable to walk. I warned my sister, who was picking him up at the airport in New York, that she would not recognize him when he landed because he had physically deteriorated so much in just a few months. Lawrence spent his 50th birthday in a hospital bed on morphine to manage his pain.

12. A few weeks later, I received a call from the hospital urging me to get to New York as soon as possible because Lawrence's health had taken a turn for the worse. I had to borrow money from friends to pay for my flight, as I could not afford it at the time. I had to ask my neighbors across the street, who were virtual strangers to me, to look after the house and the dogs for the 11 days I would be gone. With the urgency of it all, there was no time to make alternative plans. I rushed to the airport and flew up to New York. By the time I got to Lawrence, he was nearly in a vegetative state and could not communicate. He was only able to blink and open his eyes for a few seconds when my son hugged him. We arrived only hours before he would pass, and people told me that he waited for us to come and say goodbye. He passed away the next afternoon, and we were there to see him take his last breath.

13. At his funeral, a former coworker of his told us a story of how Lawrence saved his life. When Lawrence was 19, he was working with this man at a garbage incineration plant and there was an accident that caused an explosion and fire to break out. Most people ran from the fire, but Lawrence instead went in to save this man, dragging him out and bringing him to the

hospital. He broke down and said that Lawrence was the true definition of a hero. That story will always stay with me.

14. Besides the negative emotional impact that Lawrence's illness and passing had on me, this entire experience also had a severe financial impact on me. I had lived with Lawrence for almost 20 years, basically since graduating high school until he moved to North Carolina. He had a basement apartment in his home that I lived in, which allowed me to save money that I would have otherwise spent on rent and household bills. And if any other bills came up that I needed help with, he was always there to help. I relied on him financially for many years, and it is not the same for me since his illness and passing. I packed up his house and belongings and moved back to New York after his funeral. I did not have a place to stay at the time and relied on friends for five months before getting my own place. To this day, I still have the additional responsibilities of managing his possessions and estate.

15. Because we had lived in the same house for so many years, Lawrence was the one daily constant in my life. This was especially important when I had my son, as Lawrence would take care of him so I could work and save money that I would have had to otherwise spend on childcare. My son also developed a strong bond with Lawrence since he also spent time with him every day. Lawrence's passing had a profound negative affect on my son at such a young age, and my son will still cry everyday thinking about him. Sometimes, he even tells me that he wants to go to heaven to be with his uncle. That breaks my heart. I don't think he'll ever recover from losing his uncle. My younger brother is a father now, and it saddens me that his son will never have a relationship with Lawrence.

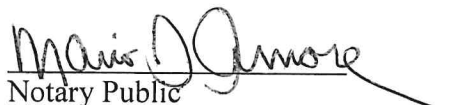
16. Lawrence was the person who would take care of his family no matter what we needed, and he would always figure out how to provide for us and keep us from struggling. He

had moved to North Carolina with the intention of purchasing a large plot of land that would allow multiple houses to be built for each member of the family to live in and be together. Our father had passed away, and so Lawrence assumed the role of family patriarch and did all he could to care for and provide for the larger family. Unfortunately, with his passing, he was never able to realize this dream.

17. Lawrence died as a result of trying to help people. He did not want to die and had plans for our family and the future. There would have been years more of his support otherwise, both emotionally and financially. His suffering and passing away is still hard for me to deal with.


JENNIFER LAMME

Sworn to before me this
4th day of ~~May~~, 2022
JUNE


Notary Public

MARIO D'AMORE
Notary Public, State of New York
No. 4685066 4685066
Qualified in Suffolk County
Commission Expires 3/30/2026

Lauren Lamme

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
LAUREN LAMME**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

LAUREN LAMME, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 125 Jerome Avenue, Mineola, New York, 11501.

2. I am currently 41 years old, having been born on November 30, 1980.

3. I am the sister of Lawrence W. Lamme, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother died from lung cancer on December 7, 2017. He was only 50 years old. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. We had a great relationship and were very close. Lawrence was our dear half-brother. Interestingly, we only found out that we were related around the age of 11 or 12. Ever since my sisters and I discovered we had a brother, being a group of three sisters, we were ecstatic to learn that we had a brother. One day Lawrence just came knocking on the door and said "I'm your brother," later explaining that we shared the same father, Lawrence Lamme. We quickly became very close and developed a strong relationship that we maintained until Lawrence's untimely passing. In fact, we were so close that I made sure that Lawrence would

be my son's godfather. My son, Gabriel, is now 11 years old, and he was always close with my brother Lawrence. We spent all of our holidays together, particularly Easter, when we would go to church and do the sunrise mass on the beach. My brother especially loved Thanksgiving, so we would visit him for Thanksgiving at his house.

6. By way of background, Lawrence was born and raised in Williston Park, then moved to Wheatley Heights, and finally before he passed he moved, briefly, to North Carolina. Since Lawrence was in Wheatley Heights, which was nearby to my home, it was nice to be able to visit with him frequently. This helped strengthen our already tight relationship. Raising my young son, it was comforting to have Gabriel's uncle and godfather nearby. Lawrence had a pool in his backyard, and we spent many summer days at his house, swimming in the pool and having barbecues. My son and I took a trip with my brother Lawrence to North Carolina to help him look at some properties there. While most of the trips we took together were with my sisters, it was nice to take a trip where it was just Lawrence, my son, and me, so we could spend some quality time together. My brother had big plans for starting a life in North Carolina. Unfortunately, it just didn't work out. My sisters and I helped him with the move in August, 2017, but sadly, he passed away that December.

7. Lawrence went down to the World Trade Center site on 9/11. He was a volunteer fireman with the Roslyn Highlands Fire Department and was proud of his service as a first responder. Ultimately, he went to Ground Zero with the Nassau County Sheriff's Department. From there, my brother didn't elaborate too much, but reported that it was chaotic downtown and that it was a traumatic experience for him. My brother felt strongly about the first responder and law enforcement community, as he worked as a corrections officer with Nassau County. Lawrence was very dedicated to his job, where he was looked up to as a great person. In fact, even some of the inmates that he would run into, after their release, kept him in high regard.

8. I recall the situation with my brother's declining health began around the time I received a call from my sister, Jennifer, who told me that she thought Lawrence's hernia was acting up. Shortly afterward, my sister took Lawrence for some tests and notified me that he was diagnosed with cancer by a radiologist. A physician confirmed the diagnosis, and Lawrence traveled to New York around November, 2017 to obtain treatment at Memorial Sloan Kettering. I learned about the diagnosis in November, 2017, although Lawrence may have known of the

diagnosis slightly earlier because it took him a week or two to get situated before he went up for treatment in NY. Aside from the problems leading up to his diagnosis, Lawrence had some shortness of breath every once in a while; however, for a long time I remember that he would constantly be clearing his throat. When I asked him about it, he would brush it off, saying “I just need to” or “It’s probably just allergies.”

9. Lawrence’s death was particularly hard for my sisters and me as we lost our mother to cancer just two years prior to his passing. As I noted earlier, Lawrence returned to New York roughly 1.5 to 2 weeks before an appointment was available at Memorial Sloan Kettering. What’s remarkable is that my brother’s lung cancer had progressed so significantly that when I saw him after he came off of that plane from North Carolina, I didn’t even recognize him. The amount of weight he lost, made him look like a skeleton. He was pale, no color to his skin, and was very weak. I was glad that Lawrence came to New York because he spent time with me, my sister, and my son; unfortunately, before his appointment at Sloan Kettering he already started to cough up blood clots, and I had to take him to Winthrop University Hospital (now NYU Langone Health) in Mineola, NY.

10. There was a dramatic change in Lawrence over the course of two months, from the time I saw Lawrence in September, after helping him move to North Carolina, and the time he came to New York in November. At Winthrop University Hospital, they agreed to treat him, and he had a reaction to one of the medicines they gave him. He was admitted there for a few days but the day before his appointment at Sloan, they discharged him. Early the next morning, because Lawrence’s body had taken such a toll, I was unable to drive him to his appointment myself. Thankfully, Roslyn rescue transported Lawrence by ambulance to Sloan Kettering. After being in the Emergency Room for a couple of hours, Lawrence was finally admitted. When he had his appointment at Sloan, the doctor told him that she had seen that his condition had become more common in younger people who were involved in 9/11. She told us that the cancer had probably spread throughout his body and that his condition was terminal. Lawrence tried to continue to fight. He underwent one round of chemotherapy. Then his breathing got progressively worse. He was on oxygen for a while but his breathing kept deteriorating. Then he had a machine that would pump more oxygen into him. They gave him a chance, but the doctor already knew the prognosis was dire.

11. Lawrence always had plans to move to North Carolina and wanted to have a property big enough to build houses for all of us to stay near him. Lawrence was really the last person we had, after losing our mother and father. I was directly impacted by my brother's death because, had he survived, there were plans to live close together, which would have been wonderful.

12. Overall, the impact of my brother's illness and death are unbearable; it's going to be five years and it still feels like just yesterday. It hurts a lot. This is a person who really made an impact on people, whether it was his job, or people who he went to church with. Everybody said he was the most genuine, kind person. It's so unfair for my brother's life to be taken just for helping and doing the right thing. We all feel the pain of it, every day. Everything just happened so fast. The day before he died, I spent all day and all night with him in the hospital. The nurse told me he wanted me to be there. I just kept praying that somehow everything would be fine. Then the next day, the nurse called me again and said he wanted me there. Unfortunately, at that point, they had medicated him to make him comfortable, which made me upset because he knew he was on his deathbed and wanted to speak to his family. I just wanted the chance to speak with him a little bit more.


LAUREN LAMME

Sworn to before me this
7th day of April, 2022


Notary Public

ALLISON SUTCH
Notary Public, State of New York
Registration No. 01SU6373142
Qualified in Nassau County
Commission Expires 4/2/2026